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September 6, 2025

SUBMITTED VIA E-FILE

The Honorable Leonard P. Stark
U.S. Court of Appeals for the Federal Circuit
717 Madison Place, NW
Washington, D.C. 20439

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,
D. Del. No. 1:17-mc-00151-LPS

Dear Judge Stark:

I write on behalf of PDV Holding, Inc. (“PDVH”) and CITGO Petroleum Corporation (“CITGO”) regarding the sealed version of the Venezuela Parties’ Objections to the Special Master’s Updated Final Recommendation, the Third Supplemental Declaration of Nathan P. Eimer, and the supporting exhibits submitted contemporaneously to the Court today.

In accordance with the Court’s July 14 Order, CITGO and PDVH conferred with the Special Master regarding his position on the confidentiality of material in the Venezuela Parties’ filings. The Special Master’s counsel provided guidance on what information should be withheld from public filing, and CITGO and PDVH have “compl[ied] with the Special Master’s directives regarding” the same. *Id.* Broadly speaking, these redactions are intended to redact information about the “Additional Consideration” in the Amber Bid (D.I. 2123 at 5 n.6), certain confidential information about the Special Master’s advisors, and any sale process information produced in discovery or otherwise exchanged with Sale Process Parties that has not otherwise been publicly filed and which the Special Master has directed must remain under seal.

CITGO and PDVH take no position on whether these materials should remain partially sealed at this time but expect that the Special Master’s forthcoming status report on hearing procedures (to be filed on September 9, 2025 (D.I. 2110)) will address the procedure for the use of sealed information at the public Sale Hearing.

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Consistent with the Court's July 14 Order, CITGO and PDVH have served unredacted versions of today's filings on parties to this case that have executed the confidentiality agreement at D.I. 1555-1.

Respectfully,

/s/ Alexandra Cumings

Alexandra Cumings (#6146)